

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

KEITH ROINSON, WILLIE KIMBROUGH, INDIVIDUALLY AND ON BEHALF OF ALL OTHERS SIMILARLY SITUATED.

Plaintiffs,

v.

UNILEVER US,
DOVE

DEFENDANT.

CLASS ACTION COMPLAINT
DEMAND JURY TRIAL

24cv5285
Judge Chang
Magistrate Judge Weisman
Randomly Assigned CAT 2

COME NOW, the Pro-Se Plaintiffs, individually and on behalf of all others similarly situated, bring this class action complaint pursuant to:

FILED

JUN 25 2024 JB

CAUSE OF AUCTION

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

VIOLATIONS OF THE ILLINOIS CONSUMER FRAUD AND DECEPTIVE

BUSINESS PRACTICES ACT (ICFA), 815 ILCS 505/1

ON February 1, 2024, The Plaintiffs Robinson and Kimbrough, drove their vehicle to Walmart to purchase some NON-ALCOHOL Deodorant. Both Plaintiffs paid 2.69 cent each

¹ see. Walker V. Nestle USA, Inc., No. 319-cv-723-L-DE, 2022 U.S. Dist. Lexis 56178, at 1-2 (S.D.Cal. Mar. 28, 2022) (denying motion to dismiss claims that "statement [were] deceptive because they falsely

lead consumers to believe that the products were produced in accordance with socially responsible standards").

for the deodorant, because Plaintiffs have had an allergic reaction from Products containing Benzyl alcohol inside of the deodorant.

While looking for some deodorant plaintiffs saw this Dove product which says "NO ALCOHOL" on the front of the deodorant. After using the product for the first time, the Plaintiffs noticed an irritating feeling, as if Plaintiffs were having an allergic reaction.

Sure, after examining the ingredients, Plaintiffs noticed this product contained Benzyl Alcohol inside of it, and Plaintiffs broke out from the deodorant. Dove deceived me along with others similarly situated into buying their product by falsely advertising that this product has "NO ALCOHOL" inside of it, on the front label. See Bell, 982 F.3d at 477 ("reasonable consumer standards does not presume, at least as a matter of law, that reasonable consumers will test prominent front-label claims by examining the fine print on the back label").

Plaintiff, and the Illinois subclass members have been injured by their purchase of the products, which were worth less than what they bargained and/ or paid for, and which they selected over other deodorants products that may have been truthfully marketed. Defendant advertising induced Plaintiffs Robinson and Kimbrough, plus the Illinois subclass members to buy the products, to buy more of them, and/ or to pay the price requested.

As a direct and proximate result of Defendant violation of ICFA Statute, Plaintiffs and other members of the Illinois subclass paid for falsely advertised Products and, as such, have suffered damages in an amount to be determined at trial. Plaintiffs bring this putative class action on behalf of themselves and all Consumers in the State of Illinois

who purchase the products during the statute of Limitations.

PARTIES

Plaintiffs Keith Robinson and Willie Kimbrough are citizens and residents of Chicago, Illinois. Defendant Unilever US/Dove place of business in Englewood Cliff, NJ and sell Dove products to Consumers in Illinois and other surrounding states in America.

JURISDICTION AND VENUE

This Court has Jurisdiction over the Subject matter of this action Pursuant to 28 U.S.C. section 1332 (d) (2), because the matter in controversy exceeds \$5,000,000 exclusive of interest and costs and is a class action in which at least one member of the class is a citizen of a different state than Defendant. The number of members of the proposed classes in aggregate exceeds 100 users. 28 U.S.C section 1332 (d)(5)(B).

This Court has Personal Jurisdiction over the defendant because it regularly conducts and or solicits business in this District.

Venue is proper in this district pursuant to 28 U.S.C. section 1391(b) because Defendant does business in this District and sells Deodorant in Walmart, CVS, Walgreen, and plenty of other stores in the 7th District.

CLASS ALLEGATIONS

Plaintiff brings this action individually and as representatives of all those similarly situated, on behalf of the below-defined classes:

Nationwide class: All persons who purchase the deodorant, this case is appropriate for class treatment because Plaintiff can prove the elements of their claims on a class wide basis using the same evidence as would be used to prove those elements in individual actions alleging the same claims.

Numerosity: The members of the classes are so numerous that joining all members would be unfeasible and impracticable. The precise membership of the classes is unknown to Plaintiffs currently; however, it is estimated that the classes number is greater than one hundred individuals. The identity of such membership is readily ascertainable via inspection of defendant sales records or other approved methods. Class members may be notified of the tendency of this action by mail, email, internet posting, and or Publication.

Questions of Law and fact common to all class members Predominate over questions affecting only individual class members. These frequent questions of Law and fact include, without limitation:

- (A) Whether, and in which Proportion, Defendant are responsible for the misleading advertising to Consumers at issue?
- (B) Whether the advertising was false, or deceptive?
- (C) Whether Defendant actions or in actions violated the Consumer Protection statute invoked herein?
- (D) Whether Plaintiff and the Class members were damaged by Defendant conduct, stating "NO ALCOHOL" and knowing it was Alcohol in the Deodorant?
- (E) Whether Defendant adequately disclosed the facts that it was Alcohol inside the Deodorant?

APPOINTING CLASS COUNSEL

Plaintiffs requesting the Court to appoint Class Guardian over this Class action Lawsuit SEE RULE 23(G).

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, individually and on behalf of the classes, demands a Jury trial on the "ICFA" Claim so triable and Judgment as follows:

- (1) Certifying the Proposed classes by appointing Plaintiffs as representative of the class, and appointing class Guardian over this class action Lawsuit.
- (2) Awarding the Plaintiffs 30 million dollars for the injures Plaintiff suffered.
- (3) Awarding Punitive and exemplary damage.
- (4) Awarding Prejudgment interest at the maximum rate permitted by applicable law.
- (5) Enjoining the defendant from selling false and misleading labels on their Product (deodorant) by stating that there is no Alcohol in the Deodorant, and you know it has Alcohol.

EXHIBITS ATTACHED TO THE COMPLAINT

Exhibit A= Plaintiff Armpit Rash

Exhibit B= Front of the Deodorant (stating No Alcohol)

Exhibit C= Back of the Deodorant (stating Benzyl Alcohol)

Exhibit D= Deodorant on Amazon website

RESPECTFULLY SUBMITTED

Keith Robinson
KEITH ROBINSON

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Chicago, IL 60636

Robinson522@gmail.com
(312) 933-6548

Willie Kimbrough

WILLIE KIMROUGH
2030 W 70th street
Chicago, IL 60636
Williekimbrough35@gmail.com
(773) 986-8977

EXHIBIT
A





EXHIBIT
B

Dove
MEN
+CARE

0%
ALUMINUM

EUCALYPTUS

• BIRCH

• PLANT-BASED MOISTURIZER
• HYDRATANT À BASE DE PLANTES

48H DEODORANT / DÉSODORISANT

NO ALCOHOL • NO PARABENS

NET WT/POIDS NET 2.6 OZ/74g

NEW / NOUVEAU

NEW / NOUVEAU

/ NOUVEAU

/ NOUVEAU

Dove
MEN
+ CARE

0%
ALUMINUM

EUCALYPTUS
+ BIRCH
+ PLANT-BASED MOISTURIZER
+ HYDRATANT À BASE DE PLANTES

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+ BIRCH
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+ HYDRATANT À BASE DE PLANTES

DEODORANT / DÉSODORISANT
NO ALCOHOL • NO PARABENS
POIDS NET **2.6 oz/74 g**



Smartlabel[®]

enabled/activé

Men+Care is a registered
/ Dove Men+Care est
ue déposée

EXHIBIT

C

DIRECTIONS: APPLY TO UNDERARMS ONLY.

WARNINGS:

- FOR EXTERNAL USE ONLY.
- DO NOT USE ON BROKEN SKIN.
- STOP USE IF RASH OR IRRITATION OCCURS.

INGREDIENTS / INGRÉDIENTS:

DIPROPYLENE GLYCOL, WATER (EAU), GLYCERIN, PROPYLENE GLYCOL, SODIUM STEARATE, POLOXAMINE 1307, FRAGRANCE (PARFUM), STEARIC ACID, SIMETHICONE, DISODIUM EDTA, BHT, BENZYL ALCOHOL, BENZYL SALICYLATE, CITRONELLOL, COUMARIN, GERANIOL, LIMONENE, LINALOOL

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Men's Grooming

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84,171

EXHIBIT
D

Roll over image to zoom in

+ CARE Deodorant Stick
uminum free deodorant
+Birch Naturally Derived
d Moisturizer, GRAY, 2.6
ck of 4)

N + CARE Store

2,410 ratings | Search this page

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9...

Style: Stick

\$27.96
(\$2.69 / Ounce)

\$39.44

\$55.46

\$40.74

Brand DOVE MEN + CARE

Item Form Stick

Scent Fresh, Eucalyptus, Minty, Forest, Sweet

Material Type Aluminum free, alcohol free, ethanol free, Free paraben free

Special Feature All Day Protection

About this item

- New Dove eucalyptus plus birch deodorant Stick with 0 percent Aluminum is specially designed for men seeking a natural deodorant that works.
- A non-irritating formula, this deodorant is infused with plant-based moisturizers to help protect your underarms from discomfort.
- With 48 hour odor protection, This deodorant stick will keep you feeling fresh and confident even longer.
- This natural deodorant has a refreshing eucalyptus and birch scent for long-lasting freshness.
- This aluminum Free Deodorant for Men glides on smoothly and is tough on odor, but not on your skin.

Report an issue with this product or seller

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exclusive deals, and award-
winning movies & TV shows
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with fast, free delivery

Delivery

Pickup

One-time purchase:

\$27.96 (\$2.69 / Ounce)

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by Amazon.

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Qty: 1

Deliver every:

5 months (Most common)

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Total price: \$68.62

[Add all 3 to Cart](#)**This item:** DOVE MEN + CARE Deodorant Stick for Men Aluminum free deodorant...\$27⁹⁶ (\$2.69/Ounce)

DOVE MEN + CARE Mens Body Wash Blue Eucalyptus and Birch 4 Count Dry Skin Body Wash with...

\$27⁸⁸ (\$0.39/Ounce)

DOVE MEN + CARE Deodorant Stick: Moisturizing Deodorant For 72-Hour Protection Clean...

\$12⁷⁸ (\$2.13/Ounce)**Explore more from DOVE MEN + CARE**

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Dove Men+Care Whole Body Deo Aluminum-Free Deodorant Spray, Aloe + Bamboo...

3

\$11.98 (\$3.00/Ounce)



DOVE MEN + CARE Face + Body Wash For Men Inner Peace Holy Basil + Hemp Seed Oil 4 C...

230

\$39.08 (\$0.54/Fl Oz)



DOVE MEN + CARE Face + Body Wash For Men Wind Down Ashwagandha + White...

240

\$32.59 (\$0.45/Ounce)



DOVE MEN + CARE Shower Tool For Stronger, Healthy-Feeling Skin Active...

7,395

\$19.96 (\$4.99/Count)



DOVE MEN + CARE 2 in 1 Shampoo & Conditioner Eucalyptus & Birch 4 Count For Healthy...

1,440

\$21.96 (\$0.46/Fl Oz)

From the manufacturer**Dove Men+Care - Deodorant Stick for Men**

Try new Dove 0% aluminum deodorant with a refreshing eucalyptus and birch scent. This aluminum Free Deodorant Stick combines plant-based moisturizers with 48 hour odor protection, leaving you feeling fresh and comfortable all day long. With 0% Aluminum, 0% alcohol, and free from parabens, you can trust this deodorant stick to keep odor at bay without irritating your skin.

Reach for this deodorant stick when you want a fresh start to the morning, or a refresh boost. For best results, apply this aluminum Free Deodorant after bathing or showering, once skin is cool and dry. Twist the applicator to release the smooth deodorant Stick and glide on in even, light strokes.

Enjoy the fresh feeling and the reassurance that comes with up to 48 hours of odor protection.



Product Description

Looking for an aluminum Free Deodorant with odor protection that works? Try new Dove 0% aluminum deodorant with a refreshing eucalyptus and birch scent. This aluminum Free Deodorant Stick combines plant-based moisturizers with 48 hour odor protection, leaving you feeling fresh and comfortable all day long. With 0% Aluminum, 0% alcohol, and free from parabens, you can trust This deodorant stick to keep odor at bay without irritating your skin. Reach for this deodorant stick when you want a fresh start to the morning, or a refresh boost whenever you need it. For best results, apply this aluminum Free Deodorant after bathing or showering, once skin is cool and dry. Twist the applicator to release the smooth deodorant Stick and glide on in even, light strokes. Enjoy the fresh feeling and the reassurance that comes with up to 48 hours of odor protection. Complete your grooming routine with the entire Dove Men + Care Naturals inspired range. Pair this aluminum Free Deodorant with the Dove Men + Care eucalyptus + Cedar body wash and Dove Men + Care lime+sage deodorant Stick. Or try our other Dove Men + Care 0% aluminum deodorant sticks and sprays, available in invigorating scents like lime + Sage and soothing ones like sandalwood + Orange.

Product details

Product Dimensions : 6.1 x 3.6 x 1.44 inches; 1.15 Pounds

Item model number : 10079400486278

Manufacturer : Unilever

ASIN : B08WWC1DGZ

Country of Origin : USA

Best Sellers Rank: #4,893 in Beauty & Personal Care (See Top 100 in Beauty & Personal Care)

#84 in Deodorant

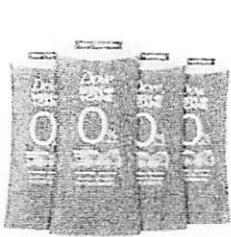
Customer Reviews:

4.4 2,410 ratings

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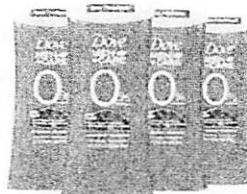
Recommendations



DOVE MEN + CARE Deodorant Stick for Men Aluminum free deodorant Eucalyptus+Birch...

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DOVE MEN + CARE Antiperspirant Deodorant Natural Inspired Sandalwood + Orange...

[Add to Cart](#)

DOVE MEN + CARE Deodorant Stick for Men Lime+Sage 4 Count Aluminum free deodorant...

[Add to Cart](#)

Dove Men+Care Stimulating Antiperspirant Dry Spray Deodorant Cedarwood & Tonka...

[Add to Cart](#)

Price	\$27.96	\$27.52	\$27.55	\$31.44
Price Per Unit	\$2.69 / Ounce	\$2.65 / Ounce	\$2.65 / Ounce	\$2.07 / Ounce
Delivery	Get it as soon as Tuesday, Feb 27	Get it as soon as Tuesday, Feb 27	Get it as soon as Tuesday, Feb 27	Get it as soon as Tuesday, Feb 27
Customer Ratings	4.4 2,410	4.5 1,161	4.4 938	4.5 382
Scent	4.2	4.0	4.2	4.2
Value For Money	3.6	3.5	3.1	3.5
Longevity	—	3.7	3.7	3.7
For Sensitive Skin	—	3.9	4.2	—
Sold By	Amazon.com	Amazon.com	Amazon.com	Amazon.com
Scent	Minty, Fresh, Forest, Sweet, Eucalyptus	Exotic, Fruity, Warm, Lemon	Citrus, Floral, Earthy, Herbal	Cedarwood and Tonka Beans
Form	Stick	Stick	Stick	Dry Spray
Volume	2.6 fluid ounces	2.6 fluid ounces	2.6 fluid ounces	3.8 fluid ounces
Ingredients	—	—	—	Aluminum Chlorohydrate (20.2%), Butane, Hydrofluorocarbon 152a,...

Videos

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Important information

To report an issue with this product or seller, click here.

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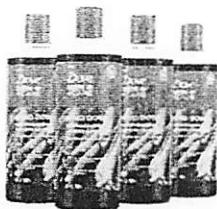
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Dove Men+Care Whole Body Duo Aluminum-Free Deodorant Spray Aloe + Bamboo...

3

\$11.98 (\$3.00/Ounce)



DOVE MEN + CARE Face + Body Wash For Men Wind Down Ashwagandha + White...

240

\$32.59 (\$0.45/Ounce)



DOVE MEN + CARE Face + Body Wash For Men Inner Peace Holy Basil + Hemp Seed Oil 4 C...

230

\$39.08 (\$0.54/Fl Oz)



DOVE MEN + CARE 2 in 1 Shampoo and Conditioner Fresh and Clean 4 Count Fortifies...

2,013

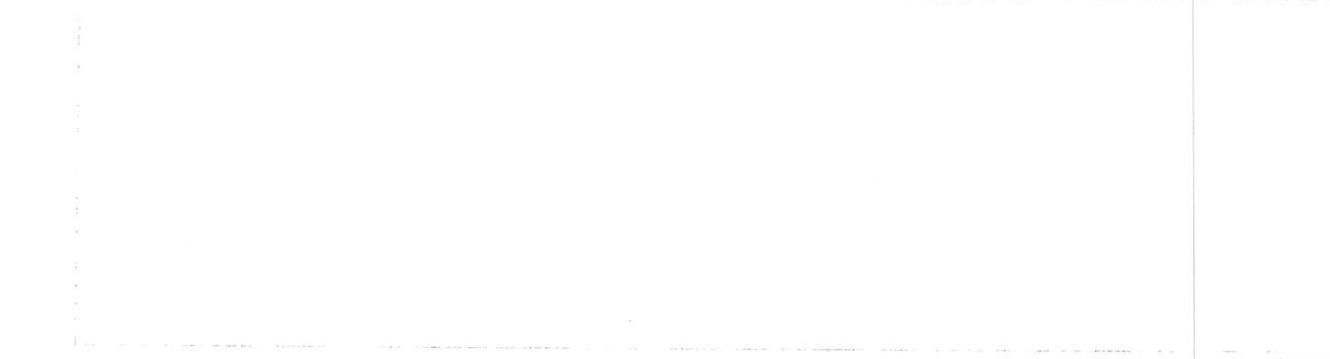
\$32.58 (\$0.32/Ounce)



Lumie Whole Body Deodorant - Smooth Solid Stick - 72 Hour Odor Control...

15,817

\$29.99 (\$5.77/Ounce)



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Page 1 of 2

Tom's of Maine
Shop the Store on Amazon :



Tom's of Maine Long-Lasting Aluminum-Free Natural Deodorant for Men,...
6,916
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Dove
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The formula is
moisturizing,
NOT STICKY OR
IRRITATING

Dove VitaminCare+ Aluminum Free
Deodorant Stick Coconut & Shea for 72...
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\$11.98 List: \$12.59

Dr. Squat
Shop the



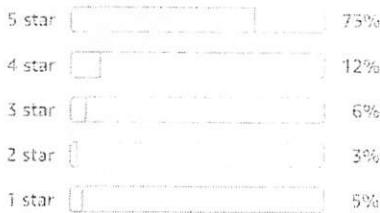
Looking for specific info?

Search in reviews, Q&A...

Customer reviews

4.4 out of 5

2,410 global ratings



Customers say

Customers like the ease of application of the body deodorant. They say it goes on smoothly and leaves no greasy residue. They appreciate the value of the product, which is aluminum-free and offers great value for money. Customers are also satisfied with the smell. However, some customers dislike the water resistance and disagree on stains, durability, irritation, and performance.

AI-generated from the text of customer reviews

Smell Value Ease of application Performance Durability Irritation Stains
 Water resistance

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Review this product

Share your thoughts with other customers

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Top reviews from the United States

Ajala Kings

Good longevity

Reviewed in the United States on January 12, 2024

Style: Stick [Verified Purchase](#)

I won't say its the best roll on I have used, but in terms of value for money it is high on my list. Most deoderants dont perform this well and people tend to use antipersperants for odor control and sweat. I find that I will still sweat a little with this deoderant, however the smell is pleasant all day. I like that it doesnt have those harmful chemical like some other ones that used to irritate my skin. I feel at ease knowing there is zero aluminium in this one as well. Or at least so they say.

[Helpful](#)[Report](#)

Markel R.

last long, no stains, my go to i love it!

Reviewed in the United States on February 10, 2024

Style: Stick [Verified Purchase](#)

smooth application, smells amazing and last through the day, i'd say like 8-9 hours before it wears off, definitely my go to i've been using it for almost a year now

[Helpful](#)[Report](#)

Victor M Valdes

Best Deodorant I Have Ever Used!

Reviewed in the United States on March 22, 2023

Style: Stick [Verified Purchase](#)

Like the soap from Dove this deodorant was a life saver for me. I used another brand when my original store bought stick was not working for me and was embarrassing the smell it could not control.

This other brand seemed to work at first but unbeknownst to me it was very strong and subsequently burned both my armpits. They became dark red and my family was in shock to say the least.

After that went away I went on a hunt here at Amazon and came across the Dove for Men product. Since my first time till today no issues at all. It is soft but yet keeps clean and no smell. It is that damn good! I will not look at any other brand. I truly believe in this product and this is not a paid review. I honestly like it and hope they keep making it for many years. Again buying in bulk is nice and lasts for months for me.

Please consider this product but be aware just because it worked for me does not mean it would work for you. Im confident that most that try it it should work. Thank You DOVE!!

6 people found this helpful

[Helpful](#)[Report](#)

Raxavier

Great but doesn't last as long as advertised

Reviewed in the United States on July 4, 2023

Style: Stick [Verified Purchase](#)

I love the smell of it. After I started using it I noticed my armpits don't itch as compared to other deodorants. There is also less pit stains on my shirts. However I'd say it only lasts for about 4 hours, afterwards I find that I need to reapply. Given the feeling of this deodorant as compared ones with aluminum, I prefer to continue using it but simply reapplying.

7 people found this helpful

[Helpful](#) [Report](#)

RT

It's deodorantReviewed in the United States on December 12, 2023
Style: Stick Verified Purchase

It's about what you would expect. Do I need 4 sticks of deodorant? No, but buying in bulk is normally cheaper if you can afford it. Sticks came all packaged in plastic together. No signs of damage and they work great. Mild scent if you are not big on the scents.

[Helpful](#) [Report](#)

Armand Matte

Love and non irritatingReviewed in the United States on December 27, 2023
Style: Stick Verified Purchase

Start using this product with many products are very irritating to my skin. No irritation. No breakouts with this product. Very happy

One person found this helpful

[Helpful](#) [Report](#)

Pc

Great Men's DeodorantReviewed in the United States on February 10, 2024
Style: Stick Verified Purchase

Have used this brand and style for years its a great product. Can be a little messy on shirts if applied right after a shower and before you put a t-shirt on.

[Helpful](#) [Report](#)

ray

Didn't agree with meReviewed in the United States on February 3, 2024
Style: Stick Verified Purchase

I didn't like this as it dried out my underarm, it looked flaky at times or shiny smooth, it also was very itchy. Due to those effects I got rid of the rest of them.

[Helpful](#) [Report](#)[See more reviews >](#)**Customers frequently viewed**

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Dove Men+Care Whole Body Deo Aluminum-Free Deodorant Spray Aloe + Bamboo...

3

\$11.98 (\$3.00/Ounce)



Dove Men+Care Whole Body Deo Aluminum-Free Deodorant Cream Aloe + Bamboo...

2

\$11.98 (\$4.79/Fl Oz)



Lume Whole Body Deodorant - Smooth Solid Stick - 72 Hour Odor Control...

15,817

\$29.98 (\$5.77/Ounce)



Native Deodorant Contains Naturally Derived Ingredients | Deodorant for Men & ...

30,636

\$12.49 (\$4.71/Ounce)



Art of Sport Men's Deodorant, Aluminum Free, Eucalyptus Fragrance, Made with...

1

\$23.99 (\$4.44/Ounce)



Mando Whole B Deodorant For t Invisible Cream Hour Odor Cont

2

\$22.99 (\$7.65)

Save 20% with coupon

[Add to cart](#)

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Disclaimer: While we work to ensure that product information is correct, on occasion manufacturers may alter their ingredient lists. Actual product packaging and materials may contain more and/or different information than that shown on our Web site. We recommend that you do not solely rely on the information presented and that you always read labels, warnings, and directions before using or consuming a product. For additional information about a product, please contact the manufacturer. Content on this site is for reference purposes and is not intended to substitute for advice given by a physician, pharmacist, or other licensed health-care professional. You should not use this information as self-diagnosis or for treating a health problem or disease. Contact your health-care provider immediately if you suspect that you have a medical problem. Information and statements regarding dietary supplements have not been evaluated by the Food and Drug Administration and are not intended to diagnose, treat, cure, or prevent any disease or health condition. Amazon.com assumes no liability for inaccuracies or misstatements about products.

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Accessibility	Protect & Build Your Brand	Amazon Business Card	Amazon Prime
Sustainability	Become an Affiliate	Shop with Points	Returns & Replacements
Press Center	Become a Delivery Driver	Credit Card Marketplace	Managing Your Content and Devices
Investor Relations	Start a Package Delivery Business	Reload Your Balance	Recalls and Product Safety Alerts
Amazon Devices	Advertise Your Products	Gift Cards	
Amazon Science	Self-Publish with Us	Amazon Currency Converter	
	Host an Amazon Hub		
	» See More Ways to Make Money		

English	United States
---------	---------------

Amazon Music Stream millions of songs	Amazon Ads Reach customers wherever they spend their time	Spin Score deals on fashion brands	Shop Books Books, art & collectibles	AMAZON Audiobook Publishing Made Easy	Sell on Amazon Start a Selling Account	Amazon Business Everything For Your Business
Amazon Fresh Groceries & More Right To Your Door	AmazonGlobal Ship Orders Internationally	Home Services Experienced Pros Happiness Guarantee	Amazon Web Services Scalable Cloud Computing Services	Audible Listen to Books & Original Audio Performances	Box Office Mojo Find Movie Box Office Data	Goodreads Book reviews & recommendations
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Whole Foods Market America's Healthiest Grocery Store	Whole Deals and Shenanigans	Zappos Shoes & Clothing	Ring Smart Home Security Systems	Chime WiFi Stream 4K Video in Every Room	Blin' Smart Security for Every Home	Neighbors App Real-Time Crime & Safety Alerts

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